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Attorneys for
JESUS RODRIGUEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:04-cr-00387- MCE
)	
Plaintiff,)	
)	STIPULATION TO CONTINUE
v.)	STATUS CONFERENCE FROM
)	APRIL 24, 2007 TO MAY 31,
JESUS RODRIGUEZ,)	2007 AT 9:00 A.M. AND EXCLUDE
)	TIME UNDER SPEEDY TRIAL ACT
Defendant.)	
)	

IT IS HEREBY STIPULATED AND AGREED between the defendant, Jesus Rodriguez, and the United States of America, through defense counsel, Bruce Locke and Assistant U.S. Attorney Phillip Talbert, that the Status Conference set for April 24, 2007 should be continued to May 31, 2007 at 9:00 a.m. The reason the continuance is that the defense has not yet received the additional discovery that the government has advised is coming. The government has recently advised the defense that the discovery should be forthcoming within the next week. The defense will need additional time to review that discovery before the defense will be in a position to advise the Court of how much additional time will be required before the case will be ready for trial. The parties agree that the time between April 24, 2007 and May 31, 2007 should be excluded from the Speedy

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1 Trial computation for the reason that the additional time is needed for defense preparation. Mr.
2 Talbert has authorized the undersigned to sign this Stipulation and Order for him.

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4 DATED: April 19, 2007


5 /S/
6 BRUCE LOCKE
7 Attorney for Mr. Jesus Rodriguez

8 DATED: April 19, 2007

9 /S/ BRUCE LOCKE
10 for PHILLIP TALBERT
11 Assistant U.S. Attorney

12 IT IS SO ORDERED.

13 Dated: May 2, 2007

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15 MORRISON C. ENGLAND, JR.
16 UNITED STATES DISTRICT JUDGE
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